

HONORABLE KYMBERLY K. EVANSON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BARBARA STROUGO, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

REALNETWORKS, INC., ROBERT
GLASER, BRUCE A. JAFFE, CHRIS JONES,
DAWN G. LEPORE, ERIK PRUSCH,
MICHAEL B. SLADE, and TIM WAN,

Defendants.

NO. 2:24-cv-00297-KKE

**STIPULATION AND ORDER REGARDING
AMENDED SCHEDULE AND RELEASE OF
SEALED COMPLAINT**

This stipulation is entered into by and between Lead Plaintiff Richard Brender (“Lead Plaintiff”) and defendants RealNetworks, Inc., Robert Glaser, Bruce Jaffe, Chris Jones, Dawn Lepore, Erik Prusch, Michael Slade, and Tim Wan (collectively, “Defendants”), by and through their undersigned counsel.

WHEREAS, on March 4, 2024, former named plaintiff, Barbara Strougo (“Strougo”), filed this action against Defendants, with a complaint under seal asserting claims under Sections 14(a) and 20(a) of the Securities Exchange Act of 1934 (the “Exchange Act”) and Rule 14a-9 promulgated thereunder (the “Complaint”) (Dkt. 1). The Complaint was filed under seal because it included

1 confidential information provided by the Defendants to Strougo as well as to Lead Plaintiff in
2 connection with a prior books and records demands.

3 WHEREAS, Defendants agreed to accept service of the complaint on April 29, 2024 (Dkt. 12-
4 13). However, Defense Counsel does not believe they received an unredacted copy of the Complaint
5 and, in any event, does not have a copy of the unredacted Complaint.

6 WHEREAS, on May 3, 2024, Lead Plaintiff filed a motion for appointment as lead plaintiff
7 and approval of lead counsel;

8 WHEREAS, on October 31, 2024, the Court entered an order appointing Lead Plaintiff as lead
9 plaintiff and his chosen counsel co-lead counsel in this Action;

10 WHEREAS, on November 15, 2024, the Court entered an agreed scheduling order;

11 WHEREAS, the Parties wish to be able to review the unredacted Complaint filed under seal;

12 WHEREAS, Defense Counsel has contacted Strougo's counsel to request a copy of the
13 unredacted Complaint, but has not received a response;

14 WHEREAS, Lead Plaintiff and Defendants have conferred regarding the next steps in the
15 Action, to request the release to the Parties of the unredacted Complaint filed under seal by Strougo
16 and to amend the schedule as follows;

17 **NOW THEREFORE**, the Parties hereby stipulate and agree, subject to the Court's approval,
18 as follows:

19 1. The Parties shall be provided by the Court with access to the sealed Complaint
20 (Dkt. 1) and the Parties shall be allowed to retrieve a copy of the Complaint in-person from the
21 Clerk's Office;

22 2. Lead Plaintiff shall file his Amended Class Action Complaint by January 14, 2025;

23 3. Defendants shall file an answer, motion to dismiss, or response thereto by
24 February 28, 2025;

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26
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4. If Defendants file a motion to dismiss as their response, Lead Plaintiff shall file any opposition thereto by April 14, 2025; and

5. Defendants shall file any reply to Lead Plaintiff's opposition by May 30, 2025.

DATED: December 16, 2024

Respectfully Submitted,

OF COUNSEL

BRESKIN JOHNSON TOWNSEND, PLLC

MONTEVERDE & ASSOCIATES PC

s/ Roger M. Townsend

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Counsel for Lead Plaintiff

Counsel for Defendants

ORDER

The Court GRANTS the parties' stipulated motion. Dkt. No. 51.

The clerk is directed to provide a copy of the unredacted complaint (Dkt. No. 4) upon request of the parties at the public window of the Clerk's Office for the U.S. District Court for the Western District of Washington.

The previous schedule (Dkt. No. 48) is VACATED. Lead Plaintiff shall file his amended class-action complaint by January 14, 2025, and Defendants shall file an answer, motion to dismiss, or response thereto by February 28, 2025. If Defendants file a motion to dismiss as their response, Lead Plaintiff shall file any opposition thereto by April 14, 2025. Defendants shall file any reply to Lead Plaintiff's opposition by May 30, 2025.

Dated: December 17, 2024.



Kymberly K. Evanson
United States District Judge